

1 to and ask the Court to enter this Stipulated Protective Order covering Personal Identifying
2 Information.

3 By stipulating to this Protective Order, the parties acknowledge that they will receive un-
4 redacted discovery containing Personal Identifying Information, and covenant to abide by the
5 guidelines for redacting Personal Identifying Information established by Rule 5.2 of the Federal
6 Rules of Civil Procedure in all electronic or paper filings with the Court.

7 Specifically, the parties agree to redact from any court filing all but the last four digits of
8 any social-security number or taxpayer identification number, all but the last four digits of any
9 financial-account number, all but the first and last initials of a minor child's name, and all but the
10 year of an individual's birth date.

11 The parties further stipulate that any Personal Identifying Information produced during
12 discovery is produced solely for purposes of prosecuting and/or defending this case only, and any
13 other use of Personal Identifying Information so produced is prohibited. The parties agree to
14 destroy material reflecting Personal Identifying Information produced by other parties at the
15 conclusion of this litigation.

16 This stipulation does not preclude use of Personal Identifying Information that is
17 consistent with the exceptions to redaction listed in Fed. R. Civ. P. 5.2(b) or an order of the Court.

18
19 IT IS SO STIPULATED.

20 Dated: 29 April, 2008



Allyson B. Baker, Attorney for Plaintiff

21 Dated: ____ April, 2008

Eric Webb, Attorney for Charles Cathcart

22 Dated: ____ April, 2008

David Porter, Attorney for Scott Cathcart

23 Dated: ____ April, 2008

Farley Neuman, Attorney for Robert Nagy

24 Dated: ____ April, 2008

Yuri Debevc, pro se

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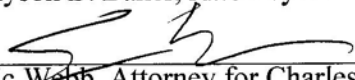
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20 Dated: ___ April, 2008

Allyson B. Baker, Attorney for Plaintiff

21 Dated: 21 April, 2008


Eric Webb, Attorney for Charles Cathcart

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David Porter, Attorney for Scott Cathcart

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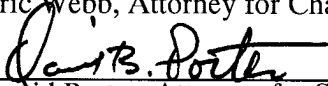
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Allyson B. Baker, Attorney for Plaintiff

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Allyson B. Baker, Attorney for Plaintiff

21 Dated: ___ April, 2008

Eric Webb, Attorney for Charles Cathcart

22 Dated: ___ April, 2008

David Porter, Attorney for Scott Cathcart

23 Dated: 28 April, 2008



Farley Neuman, Attorney for Robert Nagy

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